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1 charges and obviously is continuing to deal with that issue on
2 that front, and I'm concerned that the defendants not further
3 leverage the any sort of criminal threats in the context of
4 this case.

5 THE COURT: Mr. Schonfeld.

6 MR. SCHONFELD: Yes, your Honor.

7 So, two points. First of all, I think the first part
8 of what Mr. Reinitz stated in terms of discussing the
9 background and the history of how it was that these agreements
10 were entered into sort of underscores the need to have his
11 testimony on the record, because none of that is anything I had
12 any knowledge of and none of it is alleged in the complaint.
13 So that's just as an initial matter.

14 With respect to contact with law enforcement, I can
15 tell you that I was contacted by an assistant U.S. attorney
16 from the Southern District of New York, not the other way
17 around. I have another action in fact in which Mr. Reinitz is
18 counsel on as well involving Mr. Teman, and it's been reported
19 in the media. The Southern District of New York got wind of
20 that action and called me and asked me about information in
21 that case, which I thought may or may not have been helpful to
22 them in the criminal proceeding. I don't know if they used my
23 other action in the proceedings or not. I didn't follow the
24 criminal trial very closely.

25 And insofar as whether or not the Southern District of

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1 New York or the NYPD reached out to my client or my client
2 reached out to them, I don't have any specific knowledge of
3 that. I'm not sure what, if any, wrongdoing is being alleged
4 if a client believes that they were being taken advantage of
5 or, you know, attempted to be swindled, so to speak, for them
6 to reach out to law enforcement to lodge a complaint, but
7 again, just -- and to my knowledge -- and Ms. Moyal can correct
8 me if I'm wrong -- I don't believe she had any contact with law
9 enforcement. I did, because, as I said, they called me. I
10 gave them the information that I had with respect to the other
11 matter. I don't believe I was yet representing Goldmont at the
12 time that they reached out to me, but I'm not a hundred percent
13 sure. I provided them the information, and they did with it
14 whatever they may or may not have done.

15 So to the extent that there's a suggestion of any
16 wrongdoing or attempt to threaten, I'm not sure where that
17 comes from or what the basis of that is, and I suppose that
18 during the course of discovery, we can certainly go through all
19 of these areas of attempts by parties to blackmail and threaten
20 and pressure each other, which I think will be illuminating.
21 But I can certainly represent to the Court that I did not
22 myself reach out to law enforcement and I did not use that as a
23 tool of leverage in this case or any other companion -- not
24 companion, but the other action where I'm representing the
25 parties in litigation with GateGuard. And it certainly has no